

Southwestern Bell

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December 3, 1992

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Dear Bill:

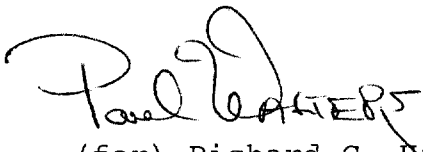
Re: CC Docket No. 92-222

Enclosed please find an original and four (4) copies of the above-referenced pleading to be filed with the Secretary of the Commission on Friday, December 4, 1992. Also enclosed is a copy of the pleading to be filed-stamped and returned to me.

Additional copies of the pleading are attached to be used as the courtesy copies and one is included for your files.

Please call to confirm that the pleading has been filed.
Thank you for your assistance.

Very truly yours,



(for) Richard C. Hartgrove
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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
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DEC - 4 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of the Part 69)
Allocation of General Support) CC Docket No. 92-222
Facility Costs)

COMMENTS OF SOUTHWESTERN BELL TELEPHONE COMPANY

Southwestern Bell Telephone Company (SWBT) hereby comments on the issues raised in the Commission's Notice of Proposed Rulemaking in FCC 92-222, released October 19, 1992 (NPRM).

This NPRM was a part of the FCC document containing the Report and Order in CC Docket No. 91-141 (R&O), in which the Commission prescribed rules governing expanded interconnection of local exchange carrier (LEC) facilities for the provision of Special Access services.¹

The Commission here proposes, as part of its expanded interconnection agenda, to revise the Part 69 Rules to eliminate over-allocation of General Support Facilities (GSF) costs to Special Access, thus eliminating contribution charges for this item. The Commission will, however, "permit LECs to seek approval of a contribution charge based on other support flows."²

SWBT supports the proposed revision to the Part 69 Rules to correct rate distortions. If the Commission allows changes in Transport and Special Access rates as a response to developing

¹ Although the R&O and the NPRM are contained in a single document, these comments will make separate reference to each as appropriate.

² R&O, para. 143.

competitive markets, it must also recognize the GSF cost shift between baskets under the price cap rules. While GSF cost allocation changes may be a step in the right direction in responding to competition in Transport and Special Access, those changes will shift costs to the Common Line category, where a recovery must take place.

The current disproportionate distribution of GSF costs among the access elements is the result of a previous attempt by the Commission to manage rate levels through Part 69 cost allocations. The cost realignments that will occur as the result of the proposed GSF change demonstrate the need to consider such realignments in the Commission's planned comprehensive review of its rules. Specifically, the Commission must address options for recovery of Common Line cost increases brought about by the GSF changes, as well as pricing rule changes.

I. BACKGROUND

The revision of the Uniform System Of Accounts (USOA) in 1988 required changes to federal rules dealing with jurisdictional cost separations and interstate access charges.³ Because the Part 69 Rules were to be changed with minimal shifts in revenue

³ *Amendment of Part 69 of the Commission's Rules and Regulations, Access Charges, to Conform It with Part 36, Jurisdictional Separations Procedures*, Report and Order, CC Docket No. 87-113, released August 18, 1987.

requirements among access categories,⁴ GSF costs⁵ were "over-allocated" to Special Access, Transport, Local Switching and other access rate elements to maintain the overall level of costs assigned to Common Line.⁶ The method chosen by the Commission employed the combined investment of Central Office Equipment (COE), Information Origination/Termination (IOT) Equipment, and Cable and Wire Facilities (C&WF), excluding C&WF message exchange line costs, to distribute GSF costs among the access elements. Even though C&WF message exchange line costs are excluded in current rules, similar COE costs (Category 4.13) are included in this current allocator. The exclusion of C&WF message exchange line costs (Category 1.3) from the allocator effectively reduced the costs assigned to Common Line and increased those costs assigned to the other access elements.

Advancements in technology and increased competition, coupled with the Commission's proposed rules for transport rate restructure (CC Docket 91-213) and expanded interconnection (CC Docket 91-141), require the prompt reevaluation of the GSF rule. The records in these proceedings demonstrate that the GSF cost allocations as prescribed by the Part 69 Rules directly contribute to distortions in LECs' current access rates. Over-allocation of GSF cost is a contributing factor that has caused the LEC Special

⁴ R. & O., para. 268. "The current language in Section 69.307 was designed to ensure that the adoption of certain changes to the separations and accounting rules would be revenue-neutral with respect to the interstate common line category."

⁵ "General Support Facilities" include buildings, land, vehicles, aircraft, work equipment, furniture, office equipment and general purpose computers as described in the Separations Manual and included in Account 2110. See Section 69.2(q).

⁶ See R&O, para. 147.

Access, Local Switching and Switched Transport rates, developed per Part 69 Rules, to be higher than they would otherwise have been.

II. PART 69 ACCESS COST IMPACTS ASSOCIATED WITH THE COMMISSION'S GSF PROPOSAL

Part 69 was not designed to establish competitive prices, nor to distinguish between competitive and less competitive markets. Instead, Part 69 is a method of allocating all interstate costs regardless of technology, market, or competitive differences. The skewed allocation of GSF costs has caused SWBT's Special Access and Traffic Sensitive rates to recover a disproportionately larger share of these common costs. Such pricing practices are not consistent with the Commission's goals.⁷ Since the proposed reallocation of GSF could correct the skewed cost recovery, SWBT supports the Commission's proposal to change GSF allocation.⁸ As shown in the table below, in SWBT, approximately \$90.5 million

⁷ See, Report and Order and Further Notice of Proposed Rulemaking, CC Docket No. 91-213, released October 16, 1992, at para. 5. A key goal of the Commission is "encouraging efficient use of transport facilities by allowing pricing that reflects costs."

⁸ Section 69.307 can be changed by deleting the words shown with a strikeout below:

§ 69.307 General support facilities.

General Support Facilities investments shall be apportioned among the interexchange category, the billing and collection category, and Common Line, Limited Pay Telephone, Local Switching, Information, Dedicated Transport, Common Transport, and Special Access elements on the basis of Central Office Equipment, Information Origination/Termination Equipment, and Cable and Wire Facilities ~~excluding Category 1-3~~, combined.

would shift from Special Access, Traffic Sensitive access, and Interexchange to Common Line.

Annual Revenue Requirement
Impact of Including
C&WF Category 1.3 for
the Allocation of GSF⁹

Common Line	\$90.5 M	12.3%
Traffic Sensitive	(63.9 M)	-10.3%
Special Access	(25.6 M)	-10.9%
Interexchange	(1.0 M)	- 2.1%

A. Price Cap LECs Do Not Have The Flexibility to Alter Their Rates To Reflect Reallocation of GSF Costs

The Part 69 change will directly affect rate of return LECs, whose rate adjustment will be largely automatic. On the other hand, rates charged by price cap LECs are not required to be dependent on Part 69 cost allocations with the exception of the End User Common Line Charge (EUCL).

The Carrier Common Line, Traffic Sensitive, Special Access, and Interexchange baskets' rates of price cap LECs such as SWBT are related to Part 69 only to the extent that the initial price cap indices were initialized based on Part 69 allocated costs and rates in effect prior to the initial price cap filing.¹⁰ SWBT's GSF cost allocation, excluding C&WF Category 1.3 investment, was reflected in SWBT's initial price cap rates. Subsequent changes to these rates, however, have been made pursuant to the Part 61 price cap rules, not the Part 69 Rules (with the exception of EUCL), and are subject to the limitations on carrier pricing

⁹ These impacts were developed from actual SWBT Part 69 cost data for January through August, 1992.

¹⁰ See 47 C.F.R. § 61.48(d); see *Policy and Rules Concerning Rates for Dominant Carriers*, Second Report and Order, CC Docket No. 87-313, 5 FCC Rcd 6786, 6814 (1980) (Price Cap Order).

flexibility imposed by Price Cap Indexes (PCIs), service category bands, subindexes and other tariff filing requirements.¹¹

Currently, "[u]nder price caps, LECs do not have the flexibility to alter their rates in a way that would reflect reallocation of costs between baskets."¹² However, SWBT and other price cap LECs should be allowed to reflect a revised GSF allocation in their rates by treating the revision as an interbasket rate realignment¹³ through appropriate adjustments to their PCIs, Actual Price Indexes (APIs) and Service Band Indexes (SBIs) under the price cap rules.

The Commission's stated goal is to promote competition. Treating the proposed reallocation of currently misallocated GSF costs as an interbasket rate realignment under price cap rules would be necessary to allow SWBT's and other price cap LECs' access rates to reflect rational cost, and help foster true competition.

B. Analysis Of GSF Cost Shift Recovery Options

Reallocation of GSF costs will shift costs from the Traffic Sensitive and Special Access categories to Common Line. The only two Common Line recovery mechanisms currently prescribed in Part 69 are the Subscriber Line Charge (SLC) [also known as the End User Common Line Charge (EUCL)], billed as a flat rate charge directly to LEC end users, and the Carrier Common Line (CCL) charge

¹¹ 47 C.F.R., sections 61.42, 61.43, 61.45-47.

¹² *Transport Rate Structure and Pricing*, Report and Order and Further Notice of Proposed Rulemaking, CC Docket 91-213, FCC 92-442, released October 16, 1992, para. 81; see 47 C.F.R. § 61.45(d)(1).

¹³ Interbasket rate realignment would be reflected in offsetting PCI adjustments to all baskets via the use of the Delta Z (ΔZ) variable in the Price Cap PCI formula.

billed on a usage basis to Interexchange Carriers (IXCs). The various options for recovering the GSF cost shifts are discussed below.

1. Recovery Under Current Rules

If no other rules change, except for the GSF cost shift proposed by the Commission, the base factor portion of Common Line¹⁴ will increase, resulting in an increase to the multi-line EUCL in each SWBT study area, subject to the \$6.00 cap contained in the current rules.¹⁵ The existing and expected multi-line EUCL rates are shown in columns A and B on the attached Table. Because the Single Line EUCL is currently at the \$3.50 cap, it will not change. Additionally, the CCL rate will be reduced, since the current rules¹⁶ require that it offset the increase in multi-line EUCL recovery. The expected CCL rates are also shown in the attached Table. More importantly, without further changes in the Commission's Rules, the decrease in GSF cost assignment to Special Access, Traffic Sensitive, and other elements will not bring about a corresponding decrease in those rates, since those rates may not be changed under price cap rules without the Commission making an exception to the existing price cap constraints, (to accomplish the needed interbasket rate realignment for the GSF change). Thus, if the Commission changes GSF with no further corresponding changes, this option does nothing to further the Commission's goals for promoting competition.

¹⁴ See § 69.501(e) for a description of the base factor portion.

¹⁵ 47 C.F.R., Part 69.104(d).

¹⁶ 47 C.F.R., Section 61.46(d).

2. Recovery Assuming Interstate Rate Basket Realignment

If the GSF changes to the access costs are recognized as an interbasket rate realignment, the Commission's desired decrease in Special Access and Traffic Sensitive rates may be realized. However, with the Single Line EUCL capped at \$3.50, the impact on SWBT operations will be a necessary increase in Carrier Common Line (CCL) rates by approximately thirty-three percent, and would result in bifurcated Originating and Terminating CCL rates. The expected CCL rates are shown in Column C on the attached Table.

Since GSF costs are generally not directly related to network traffic usage, assignment of reallocated GSF costs to usage sensitive elements charged to interexchange carriers, namely the CCL, undermines the Commission's long term objectives.¹⁷ Transferring the costs to CCL Switched Access element does not lower the customer's cost of Switched Access services in the aggregate. Thus, in the long term, recovery of these costs through CCL may be counter productive and inappropriate. Another alternative may be an increase in the EUCL cap(s), but such a change should only be addressed in an overall review of access structure.¹⁸

3. Recovery Through Implementation Of A Public Policy Rate Element

Another alternative to recovery would be the development of a Public Policy rate element to share GSF cost shifts with all market participants. This option is similar to the contribution charge contemplated by the Commission if the Part 69 change is not

¹⁷ See Footnote 7, p. 4.

¹⁸ Corresponding rate changes may also impact state operations that mimic interstate rates designed to discourage rate shopping.

adopted. Significant levels of GSF costs have been allocated by the LECs in support of Public Policy objectives, mainly universal service. The Commission, in the R. & O., states: "[A]ll market participants should contribute to regulatorily mandated support flows reflected in the LECs' rates for services subject to competition."¹⁹

SWBT supports a comprehensive review of access to address all Public Policy concerns, including recovery of GSF costs addressed in this proceeding. However, changes related to such a Public Policy element should not be tied to provision of LEC services. For example, it would be more desirable to bill all market participants on a flat rate basis. This would not disadvantage LECs' competitive services. If GSF costs are recovered through a Public Policy rate element, competition will be fostered by allowing LECs to reduce their competitive Special Access and Traffic Sensitive rates. The attached Table, Column D, shows the impact on SWBT of assigning GSF costs to a Public Policy element for recovery. A Public Policy rate element would be consistent with the recovery of Public Policy support flows that are being addressed in other proceedings. Moreover, this method will not force increases in other access charges such as Switched Access CCL, but could lead to decreased access rates, lower interstate long distance rates (prices), increased economic efficiency, and increased consumer welfare.

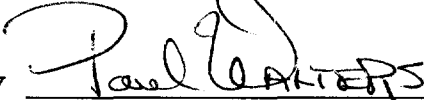
¹⁹ R. & O., para. 143.

III. CONCLUSION

SWBT supports the proposed modification of the GSF cost allocation since it may allow competitive access rates to reflect more rational cost consistent with the Commission's goals. However, recovery of the cost shifts presents a dilemma for price cap LECs. Under current rules, price cap LECs cannot lower their competitive Special Access and Traffic Sensitive rates unless an interbasket rate realignment would be allowed for the GSF change. Nonetheless, SWBT believes that the Commission should address all Public Policy concerns, including the recovery of GSF, in a comprehensive review of access charges.

Respectfully submitted,

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December 4, 1992

SOUTHWESTERN BELL TELEPHONE COMPANY

**GENERAL SUPPORT FACILITIES PART 69 ALLOCATION
PER COMMISSION PROPOSAL TO INCLUDE C&WF CAT. 1.3**

	COLUMN A	COLUMN B *	COLUMN C **	COLUMN D
	EXISTING	GSF COST SHIFT ALONE PRODUCES NO CHANGE IN SPECIAL OR TS RATES	INTERBASKET REALIGNMENT REDUCES SPECIAL AND TS RATES	PUBLIC POLICY REDUCES SPECIAL AND TS AND MAINTAINS CL RATES
SINGLE LINE EUCL	\$3.50	\$3.50	\$3.50	\$3.50
MULTILINE EUCL:				
ARKANSAS	\$5.30	\$6.00	\$6.00	\$5.30
KANSAS	\$4.90	\$5.50	\$5.50	\$4.90
MISSOURI	\$4.00	\$4.55	\$4.55	\$4.00
OKLAHOMA	\$4.80	\$5.55	\$5.55	\$4.80
TEXAS	\$4.70	\$5.35	\$5.35	\$4.70
ORIGINATING CCL	\$0.007776	\$0.006955	\$0.010000 ***	\$0.007776
TERMINATING CCL	\$0.007776	\$0.006955	\$0.010575	\$0.007776
TOTAL REVENUES ****				
COMMON LINE REVENUES	\$738,931,851	\$738,931,851	\$829,418,976	\$738,931,851
SWITCHED ACCESS REVENUES	\$611,516,939	\$611,516,939	\$547,609,939	\$547,609,939
SPECIAL ACCESS REVENUES	\$279,478,126	\$279,478,126	\$253,854,126	\$253,854,126
INTEREXCHANGE REVENUES	\$39,328,306	\$39,328,306	\$38,351,306	\$38,351,306
PUBLIC POLICY/CONTRIBUTION CHARGE	NOT APPLICABLE	NOT APPLICABLE	NOT APPLICABLE	\$90,498,000

IMPACT ON MULTILINE EUCL AND CARRIER COMMON LINE RATES WITH:

- * SHIFT IN GSF TO COMMON LINE (BASE FACTOR PORTION) WITHOUT INTERBASKET REALIGNMENT (CURRENT RULES)
- ** SHIFT IN GSF TO COMMON LINE (BASE FACTOR PORTION) WITH INTERBASKET REALIGNMENT, AND WITHOUT OTHER RECOVERY MECHANISM
(NOTE: IN SWBT, A SINGLE LINE EUCL INCREASE OF UP TO \$4.15 WOULD BE REQUIRED TO MAINTAIN CURRENT CCL RATE)
- *** SEE PART 69 ACCESS CHARGES RULES, SECTION 69.105(b)(4) FOR EXPLANATION OF ORIGINATING CCL RATES
- **** AT 1991 BASE PERIOD DEMAND LEVEL, EXCLUDES PENDING RATE CHANGES IN TRANSMITTAL NUMBERS 2224 AND 2244

CERTIFICATE OF SERVICE

I, Gigi Renaud, hereby certify that the foregoing "Comments of Southwestern Bell Telephone Company" in Docket No. 92-222, has been served this 4th day of December, 1992 to the Parties of Record.

A handwritten signature in cursive script, reading "Gigi Renaud", is written over a horizontal line.

Gigi Renaud

December 4, 1992

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